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dba BLACKWATER WORLDWIDE

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

BLACKWATER LODGE AND TRAINING CENTER, INC., a Delaware corporation dba BLACKWATER WORLDWIDE, Plaintiff, v. KELLY BROUGHTON, in his capacity as Director of the Development Services Department of the City of San Diego; AFSANEH AHMADI, in her capacity as Chief Building Official of the City of San Diego; THE DEVELOPMENT SERVICES DEPARTMENT OF TE CITY OF SAN DIEGO; THE CITY OF SAN DIEGO, a municipal entity; and DOES 1-20, inclusive, Defendants.	Case No. 08 CV 0926 The Hon. Marilyn Huff Dept. 13 **DECLARATION OF JENNIFER CHAVEZ IN SUPPORT OF PRELIMINARY INJUNCTION** Date: June 17, 2008 Time: 10:00 a.m. Complaint Filed: May 23, 2008 [Plaintiff's Reply To Opposition To Preliminary Injunction And Supplemental Declaration of Brian Bonfiglio filed concurrently herewith.]

I, JENNIFER LA FOND CHAVEZ, declare as follows:

1. I am an attorney duly licensed to practice law before the courts of this State. I am an attorney with the law firm of Luce, Forward, Hamilton & Scripps LLP, attorneys of record for Plaintiff BLACKWATER LODGE AND TRAINING CENTER, INC., dba BLACKWATER WORLDWIDE in the above-captioned matter. The facts stated herein are personally known to me, and if called as a witness I could competently testify thereto.

2. On May 22, 2008, I visited the City of San Diego Development Services Department ("Department") to review ministerial and discretionary permits issued for two indoor shooting ranges located in the City of San Diego: the American Shooting Center at 5590 Ruffin Road and the Discount Gun Mart and Indoor Range at 1510 Morena Boulevard. A representative from the Department, Juan Alvarez, provided me with a list of all ministerial permits associated with the properties. Mr. Alvarez and another representative of the Department advised me that no discretionary permits have issued for the American Shooting Center property. Mr. Alvarez advised that there were discretionary permits associated with the property located at 1510 Morena Boulevard, the site of the Discount Gun Mart and Indoor Range. Mr. Alvarez ordered all relevant files from an offsite archive location for my review.

3. On June 4, 2008, I reviewed the discretionary permit files for the Discount Gun Mart and Indoor Range property. The discretionary permits included (1) a 1976 conditional use permit (Case No. C-12811) authorizing a portion of the property to be used as a parking lot to support an adjacent office building, and (2) a 1980 Zoning Administrator approval (Case No. C-16974) authorizing a deviation from signage regulations to support a shopping center. The City's discretionary permit file did not include any permit or other entitlement relating to the shooting range or the use of firearms on the Discount Gun Mart and Indoor Range property.

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on June 12, 2008 in San Diego, California.

LUCE, FORWARD, HAMILTON & SCRIPPS LLP

By: ______________________
Jennifer La Fond Chavez